IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DONNA CURLING, et al;)
Plaintiffs,))
v.) (CIVIL ACTION) FILE NO: 1:17cv02989-AT
BRAD RAFFENSBERGER, et al.;))
Defendants.)))
)

FULTON COUNTY DEFENDANTS' RESPONSE TO ORDER

The Members of the Fulton County Board of Registration and Elections, Cathy Woolard, Teresa K. Crawford, Kathleen D. Ruth, Mark Wingate, and Aaron Johnson, (hereafter "Fulton County Defendants") hereby file this Response to Paragraph 4 of the Court's January 24, 2022 Order.

In it's Order of January 24, 2022 [Doc. 1272], the Court provides:

4. The Parties are each **DIRECTED** to file a statement, not to exceed two pages, explaining their respective position(s) as to any further extension in discovery.

The Fulton County Defendants do not object to the extension of discovery in

this case. As this Court is aware, there are numerous attorneys that represent both sets of Plaintiffs and the State Defendants in this case. The Fulton County Defendants, however, are not represented by numerous firms or attorneys. To complete the remaining discovery, it will likely be necessary to "double-book" depositions and/or proceedings. Consequently, this would put the Fulton County Defendants at a disadvantage. To eliminate such a disadvantage, the Fulton County Defendants would prefer that discovery be extended and would not object to any such extension requested by the other parties or considered by the Court.

Respectfully submitted this 26th day of January, 2022.

OFFICE OF THE COUNTY ATTORNEY

/s/ David R. Lowman

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CERTIFICATE OF SERVICE

I hereby certify that on this date I have electronically filed the foregoing **FULTON COUNTY DEFENDANTS' RESPONSE TO ORDER** with the Clerk of Court using the CM/ECF system, with the Clerk of Court using the CM/ECF system, which will send email notification of such filing to all attorneys of record.

This 26th day of January, 2021.

/s/ David R. Lowman

David Lowman

Georgia Bar Number: 460298

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